

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America  
v.

Case No.

2:18-mj-70

Michael N. Farmer  
*Defendant(s)*

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 01/24/2018 in the county of Franklin in the  
Southern District of Ohio, the defendant(s) violated:

*Code Section*  
21 USC 846

*Offense Description*  
Conspiring to Possess with Intent to Distribute Cocaine

This criminal complaint is based on these facts:

See attached Affidavit.

☒ Continued on the attached sheet.

  
*Complainant's signature*

Jonathan Hanley, DEA  
*Printed name and title*

Sworn to before me and signed in my presence.

Date: 01/31/2018

  
*Judge's signature*

City and state: Columbus, OH

Kimberly Jolson, U.S. Magistrate Judge  
*Printed name and title*

Affidavit Of Probable Cause

I, Jonathan Hanley, having been duly sworn depose and state:

1. I am a Special Agent of the Drug Enforcement Administration (DEA), assigned to the Detroit Field Division, Columbus District Office. As such, I am an "investigative or law enforcement officer" of the United States within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 18 United States Code, Section 2516(1). I have been a Special Agent of the DEA for approximately five (5) years, during which time I have participated in numerous investigations involving narcotics trafficking. I have received specialized training on the subjects of narcotics trafficking and money laundering from the DEA and have been personally involved in investigations concerning the possession, manufacture, transportation, distribution, and importation of controlled substances, as well as methods used to finance drug transactions. The information set forth in this affidavit comes from my personal involvement in this investigation, as well as information provided to me by other law enforcement officers.

2. On 1/24/2018 OSHP initiated a traffic stop of Robert Eugene BRANNON with a marked unit. After initially stopping when the marked unit's lights were activated BRANNON then fled in his vehicle and was eventually stopped again several miles away. A bag containing 2.34 kilograms of suspected cocaine and multiple pounds of sealed marijuana were recovered in an area a short distance from where BRANNON fled. BRANNON was advised of his Miranda warnings and agreed to answer <sup>5H</sup> questions. *The incident occurred in Franklin County Ohio.*

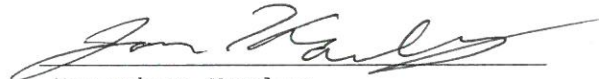
3. BRANNON stated he fled because he was smoking marijuana when he was pulled over. He threw the bag containing 2.34 kilograms of cocaine after he left the initial vehicle stop, bags that he had intended to deliver to one of his regular customers later that day.

4. Investigators positively identified Michael N. FARMER as the customer who was the intended purchaser of the 2.34 kilograms when FARMER approached the bags which were discarded by BRANNON while BRANNON fled from OSHP.

5. During the traffic stop BRANNON confirmed to investigators that BRANNON had contacted FARMER to retrieve the 2.34 Kilograms of cocaine and BRANNON state he told FARMER in a cellular phone call, while fleeing, where the 2.34 Kilograms could be located and further requested FARMER to retrieve them.

6. Through call history and text messages from BRANNON's cell phone investigators corroborated BRANNON's statement regarding FARMER's involvement in this narcotics transaction.

7. Based upon this information, I believe that probable cause exists that Michael Noah FARMER has violated 21 U.S.C. §§ 846 Conspiracy to Possess with Intent to Distribute a controlled substance (cocaine).



Jonathan Hanley  
Special Agent  
Drug Enforcement Administration

Subscribed and Sworn to before me  
this 31st day of January, 2018



Kimberly Jolson  
U.S. Magistrate Judge